

Lexi J. Hazam (SBN 224457)  
*lhazan@lchb.com*  
LIEFF CABRASER HEIMAN  
& BERNSTEIN LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: 415-356-1000

Christopher A. Seeger (*pro hac vice*)  
*cseeger@seegerweiss.com*  
SEEGER WEISS LLP  
55 Challenger Road, 6th Floor  
Ridgefield Park, NJ 07660  
Telephone: 973-639-9100

Previn Warren (*pro hac vice*)  
MOTLEY RICE, LLC  
401 9th Street NW, Suite 630  
Washington, DC 20004  
Telephone: 202-386-9610

*Plaintiffs' Co-Lead Counsel*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates to:  
  
ALL ACTIONS

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING SCHEDULE CONCERNING  
PROPOSED PRESERVATION ORDER**

Pursuant to Civil Local Rules 6-1(b) and 6-2, the Parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadlines that were adopted with respect to the Preservation Order [ECF Nos. 386, 390], as follows:

1 WHEREAS, on October 13, 2023, the parties filed a joint discovery letter summarizing  
 2 the MDL and the pending disputes and proposing a schedule for further negotiations and  
 3 resolution of disputes over a proposed Preservation Order [ECF No. 386];  
 4

5 WHEREAS, on October 17, 2023, the Court adopted the parties' proposed meet and  
 6 confer schedule with respect to the Preservation Order [ECF No. 390], as follows:  
 7

- 8 1. October 20: Defendants provide Plaintiffs with an updated proposed  
 Preservation Order;
- 9 2. Between October 21-31: Parties meet and confer to the extent necessary to  
 10 clarify Defendants' revisions;
- 11 3. November 1: Plaintiffs provide Defendants with a redline to the updated  
 12 proposed Preservation Order;
- 13 4. Between November 2-10: Parties meet and confer regarding outstanding  
 14 disputes; and
- 15 5. November 15: Parties submit a joint status report in which they either offer a  
 16 joint proposal for briefing the remaining disputes or submit competing  
 proposals with respect to briefing.

17 WHEREAS, on October 20, 2023, Defendants provided Plaintiffs with an updated  
 18 proposed Preservation Order, together with information regarding Defendants' data sources and  
 19 tools; and

20 WHEREAS, Plaintiffs requested additional time to respond to Defendants, and  
 21 Defendants agreed, provided that other dates in the schedule be extended.

22 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO  
 23 THE COURT'S APPROVAL, THAT THE SCHEDULE ADOPTED AT ECF No. 390 IS  
 24 MODIFIED AS FOLLOWS:

- 25 1. November 13: Plaintiffs provide Defendants with a redline to the updated  
 26 proposed Preservation Order;
- 27 2. Between November 14-December 6 (excluding the week of Thanksgiving):  
 28 Parties meet and confer regarding outstanding disputes; and

3. December 11: Parties submit a joint status report in which they either offer a joint proposal for briefing the remaining disputes or submit competing proposals with respect to briefing.

Dated: November 11, 2023

/s/ Christopher A. Seeger  
Christopher A. Seeger, *pro hac vice*  
**SEEGER WEISS LLP**  
55 Challenger Road, 6th Floor  
Ridgefield Park, NJ 07660  
Telephone: 973-639-9100  
cseeger@seegerweiss.com

Lexi J. Hazam (SBN 224457)  
**LIEFF CABRASER HEIMAN  
& BERNSTEIN LLP**  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: 415-356-1000  
lhazan@lchb.com

Previn Warren, *pro hac vice*  
**MOTLEY RICE, LLC**  
401 9th Street NW, Suite 630  
Washington, DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

*Plaintiffs' Co-Lead Counsel*

**COVINGTON & BURLING LLP**

/s/ Ashley M Simonsen  
Ashley M. Simonsen, SBN 275203  
**COVINGTON & BURLING LLP**  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*  
Paul W. Schmidt, *pro hac vice*  
**COVINGTON & BURLING LLP**  
One CityCenter  
850 Tenth Street, NW

Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com  
Email: pschmidt@cov.com

Emily Johnson Henn (State Bar. No. 269482)  
COVINGTON & BURLING LLP  
3000 El Camino Real  
5 Palo Alto Square, 10th Floor  
Palo Alto, CA 94306  
Telephone: + 1 (650) 632-4700  
Facsimile: +1 (650) 632-4800  
Email: ehenn@cov.com

Isaac D. Chaput (Bar No. 326923)  
COVINGTON & BURLING LLP  
Salesforce Tower  
415 Mission Street, Suite 5400  
San Francisco, California 94105  
Telephone: + 1 (415) 591-6000  
Facsimile: + 1 (415) 591-6091  
Email: ichaput@cov.com

Gregory L. Halperin, *pro hac vice*  
COVINGTON & BURLING LLP  
620 Eighth Avenue  
New York, NY 10018  
Telephone: + 1 (212) 841-1000  
Facsimile: +1 (212) 841-1010  
Email: ghalperin@cov.com

*Attorney for Defendants Meta Platforms, Inc.  
f/k/a Facebook, Inc.; Facebook Holdings,  
LLC; Facebook Operations, LLC; Facebook  
Payments, Inc.; Facebook Technologies, LLC;  
Instagram, LLC; Siculus, Inc.; and Mark Elliot  
Zuckerberg*

**KING & SPALDING LLP**

/s/ Geoffrey M. Drake

Geoffrey M. Drake

King & Spalding LLP

1180 Peachtree Street, NE, Suite 1600

Atlanta, GA 30309

Telephone: + 1 (404) 572-4600

Facsimile: + 1 (404) 572-5100

Email: gdrake@kslaw.com

**FAEGRE DRINKER LLP**

/s/Andrea Roberts Pierson

Andrea Roberts Pierson

Faegre Drinker LLP

300 N. Meridian Street, Suite 2500

Indianapolis, IN 46204

Telephone: + 1 (317) 237-0300

Facsimile: + 1 (317) 237-1000

Email: andrea.pierson@faegredrinker.com

*Attorneys for Defendants TikTok Inc. and  
ByteDance Inc.*

**MUNGER, TOLLES & OLSEN LLP**

/s/ Jonathan H. Blavin

Jonathan H. Blavin, SBN 230269

MUNGER, TOLLES & OLSON LLP

560 Mission Street, 27th Floor

San Francisco, CA 94105-3089

Telephone: (415) 512-4000

Facsimile: (415) 512-4077

Rose L. Ehler (SBN 29652)

Victoria A. Degtyareva (SBN 284199)

Ariel T. Teshuva (SBN 324238)

MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

Los Angeles, CA 90071-3426

Telephone: (213) 683-9100

Facsimile: (213) 687-3702

Lauren A. Bell, *pro hac vice*

MUNGER, TOLLES & OLSON LLP

601 Massachusetts Ave., NW St.,

Suite 500 E

1 Washington, D.C. 20001-5369  
2 Telephone: (202) 220-1100  
3 Facsimile: (202) 220-2300

4 *Attorneys for Defendant Snap Inc.*

5 **WILSON SONSINI GOODRICH & ROSATI**  
6 **Professional Corporation**

7 /s/ Laura Gallo White

8 Lauren Gallo White  
9 Wilson Sonsini Goodrich & Rosati  
10 lwhite@wsgr.com  
11 Samantha A. Machock  
12 smachock@wsgr.com  
13 One Market Plaza, Spear Tower, Suite 3300  
14 San Francisco, CA 94105  
15 Telephone: (415) 947-2000  
16 Facsimile: (415) 947-2099

17 Brian M. Willen  
18 Wilson Sonsini Goodrich & Rosati  
19 bwillen@wsgr.com  
20 1301 Avenue of the Americas, 40th Floor  
21 New York, New York 10019  
22 Telephone: (212) 999-5800  
23 Facsimile: (212) 999-5899 Christopher Chiou  
24 Wilson Sonsini Goodrich & Rosati  
25 cchiou@wsgr.com  
26 633 West Fifth Street  
27 Los Angeles, CA 90071-2048  
28 Telephone: (323) 210-2900  
Facsimile: (866) 974-7329

**WILLIAMS & CONNOLLY LLP**

/s/ Ashley W. Hardin

Ashley W. Hardin, *pro hac vice*  
ahardin@wc.com  
Joseph G. Petrosinelli, *pro hac vice*  
jpetrosinelli@wc.com  
680 Maine Avenue, SW  
Washington, DC 20024  
Tel.: 202-434-5000

**MORGAN LEWIS & BOCKIUS, LLP**

/s/ Stephanie Schuster

Stephanie Schuster  
stephanie.schuster@morganlewis.com  
1111 Pennsylvania Ave.  
NW Washington, DC 20004-2541  
Tel.: 202.373.6595

Brian Ercole

brian.ercole@morganlewis.com  
600 Brickell Avenue, Suite 1600  
Miami, FL 33131-3075  
Tel.: 305.415.3416

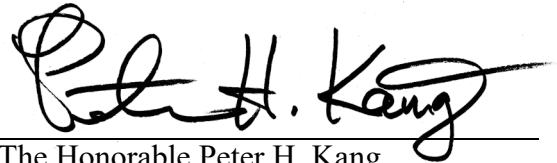
Yardena R. Zwang-Weissman

yardena.zwang-weissman@morganlewis.com  
300 South Grand Avenue, 22nd Floor  
Los Angeles, CA 90071-3132  
Tel.: 213.612.7238

*Attorneys for Defendants YouTube, LLC,  
Google LLC, and Alphabet Inc.*

PURSUANT TO STIPULATION,  
IT IS SO ORDERED.

DATED: November 13, 2023



The Honorable Peter H. Kang  
United States Magistrate Judge

**SIGNATURE CERTIFICATION**

Pursuant to Civ. L. R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

Dated: November 11, 2023

/s/ Christopher A. Seeger

Christopher A. Seeger  
**SEGER WEISS LLP**  
55 Challenger Road, 6th Floor  
Ridgefield Park, NJ 07660  
Telephone: 973-639-9100  
cseeger@seegerweiss.com